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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

MICHAELA MANAGO and QUENTIN PAUL
GARCIA,

Plaintiffs,

vs.

HAP TRUCKING LTD; and GURHAM
SINGH GILL,

Defendants.

Case No.: 2:24-cv-01496-TLN-CKD

**STIPULATION AND ORDER RE
MODIFICATION OF PRETRIAL
SCHEDULING ORDER**

THE PARTIES, THROUGH THEIR COUNSEL OF RECORD, agree to the following
modifications to the Court's Pretrial Scheduling Order:

1. The parties have acted diligently throughout this matter, but due to a number of outstanding
legal and discovery issues, the parties agree that additional time is necessary to complete
discovery and prepare the matter for trial. The outstanding issues include:

a. Additional time will permit the parties to continue with meaningful discovery and
investigation and to coordinate depositions of party witnesses, third party witnesses,
and medical treaters;

b. Due to circumstances outside the control of Plaintiff Michaela Manago, her previously
scheduled deposition has been continued to December 3, 2025;

- c. In October 2026, Plaintiff requested dates for depositions of Persons Most Knowledgeable as to Defendant. Plaintiff proposed dates in the November 2026 time period. Plaintiff was recently informed that the designated Person Most Knowledgeable is out of North America and does not expect to be back until sometime in February 2026. Discovery is presently scheduled to close on March 19, 2026, and as such there would be insufficient time to conduct further discovery based on the testimony;
 - d. The parties are presently in a dispute regarding Plaintiff Michaela Manago's recent requests for production of documents, and the parties have engaged in multiple meet and confer efforts. Additional time is necessary to resolve this dispute.
 - e. Plaintiff Michaela Manago continues to treat and recover from her collision related injuries, and she expects that there will be a substantial change in her treatment and/or recovery near and/or after the close of discovery; and
 - f. The parties have also agreed to mediate this matter with Ernest Long, Esq., and due to Mr. Long's impacted scheduled, mediation has been scheduled for January 20, 2026;
2. The parties agree that they have proceeded in good faith, and any delay is not due to a lack of diligence. The parties have propounded and responded to discovery, and depositions have been taken, however further discovery is necessary. The parties expect that additional discovery, and depositions may be necessary thereafter and additional time is necessary to accommodate any further discovery.
 3. The parties also agree that extending these cut-off dates to a time period after mediation will be beneficial to and support potential settlement in that the parties will not have been forced to expend substantial sums on expert discovery that may otherwise impede potential resolution.
 4. The parties agree that this extension is in the interests of judicial economy.
 5. Subject to court approval, the parties have agreed to the following deadlines regarding discovery, expert discourse and the filing of dispositive motions:
 - a. Discovery, with the exception of expert discovery, shall be completed by July 17, 2026;
 - b. The initial expert disclosure deadline shall be September 18, 2026;

- 1 c. The supplemental expert disclosure deadline shall be October 30, 2026;
2 d. Supplemental disclosures and responses pursuant to FRCP § 26(e) shall be exchanged
3 no later than December 4, 2026;
4 e. Dispositive motions shall be filed no later than January 8, 2027.

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6 Dated: November 24, 2025

EASON & TAMBORNINI, ALC

7 /s/ Kristofor K. Helm

8 KRISTOFOR K. HELM

9 Attorney for Plaintiffs

10 Dated: November 24, 2025

**LAW OFFICES OF GORDON REES SCULLY
MANSUKHANI, LLP**

12 /s/ David A. Serrano

13 DAVID A. SERRANO

14 Attorney for Defendants
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ORDER

Good Cause appearing and based on the stipulation of the parties, the Pretrial Scheduling Order is modified as follows:

- a. Discovery, with the exception of expert discovery, shall be completed by July 17, 2026;
- b. The initial expert disclosure deadline shall be September 18, 2026;
- c. The supplemental expert disclosure deadline shall be October 30, 2026;
- d. Supplemental disclosures and responses pursuant to FRCP § 26(e) shall be exchanged no later than December 4, 2026;
- e. Dispositive motions shall be filed no later than January 8, 2027.

IT IS SO ORDERED.

Dated: November 24, 2025



Troy L. Nunley
Chief United States District Judge

PROOF OF SERVICE

I, ANGELICA SAECHAO, hereby declare and state that:

I am over the age of eighteen years, employed in the County of Sacramento, California, and not a party to the within action. My business address is 1234 H Street, Suite 200, Sacramento, California.

On November 24, 2025, I served the within:

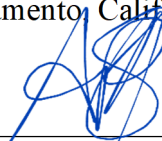
STIPULATION AND ORDER RE MODIFICATION OF INITIAL PRETRIAL SCHEDULING ORDER

on the parties as follows:

David A. Serrano
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- [X] (BY ELECTRONIC TRANSMISSION) EMAIL or ELECTRONIC TRANSMISSION:
Based on a court order or an agreement of the parties to accept service by e-mail or electronic transmission, I caused the documents to be sent to the person at the e-mail addresses listed above. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.
- [X] (State) I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed November 24, 2025, at Sacramento, California.



ANGELICA SAECHAO